

**GOVERNMENT’S POSITION ON REDACTIONS AND SEALING FOR RESPONSES
TO FOUR RULE 12 MOTIONS TO BE TRANSMITTED BY EMAIL (PER THE
COURT’S PAPERLESS ORDERS (ECF Nos. 320, 365))**

1 - Government’s Opposition to Donald J. Trump’s Motion for Dismissal or Suppression of Evidence Obtained from Mar-a-Lago or His Attorneys

RESPONSE TO MOTION: Proposed redactions in red boxes, on pp. 13-17, 22-24. Rationale: Potential witness safety / witness identifying information; references to non-public substance of potential witness testimony; references to content of sealed documents.

GOVERNMENT CITATIONS TO DEFENSE EXHIBITS OR EXHIBITS FROM OTHER FILINGS WHERE GOVERNMENT HAS PROPOSED TO REDACT OR SEAL: Def. Exs. 16-19 (Gov’t Response. at 16, 24) – Seal all. *See* ECF No. 348-1, at 2.

GOVERNMENT EXHIBITS:

Gov’t Ex. No.	Description	Redact / Seal / None	Justification
1	SDFL Mar-a-Lago Search Warrant (22-mj-8332)	Redact	Potential witness safety; names and identifying information for witnesses and ancillary persons.
2	Excerpt of Potential Witness’s Transcribed Notes I	Seal	This exhibit is part of a sealed matter in the District of Columbia that the Government will be moving for transfer pursuant to Rule 6(e)(3)(G); potential witness safety/witness names; integrity of trial testimony; potential trial exhibits; information for witnesses and ancillary persons; Rule 6(e).
3	Excerpt of Potential Witness’s Transcribed Notes 2	Seal	This exhibit is part of a sealed matter in the District of Columbia that the Government will be moving for transfer pursuant to Rule 6(e)(3)(G); potential witness safety/witness names; integrity of trial testimony; potential trial exhibits; information for witnesses and ancillary persons; Rule 6(e).
4	Excerpt of Grand Jury Transcript of a Potential Witness	Seal	Potential witness safety/witness names; integrity of trial testimony; information for witnesses and ancillary persons; Rule 6(e).
5	Excerpt of Grand Jury Transcript of a Potential Witness	Seal	Potential witness safety/witness names; integrity of trial testimony; information for witnesses and ancillary persons; Rule 6(e).

2 - Government's Opposition to Defendant Waltine Nauta's Motion to Suppress Evidence

RESPONSE TO MOTION: No proposed redactions to Government's response, thus filed on CM/ECF (ECF No. 381).

GOVERNMENT CITATIONS TO DEFENSE EXHIBITS OR EXHIBITS FROM OTHER FILINGS WHERE GOVERNMENT HAS PROPOSED TO REDACT OR SEAL: N/A.

GOVERNMENT EXHIBITS:

Gov't Ex. No.	Description	Redact / Seal / None	Justification
1	SDFL Search Warrant for Nauta car and phones (22-mj-8547)	Redact	PII; potential witness safety; names and identifying information for witnesses and ancillary persons.
2	Unexecuted SDFL Search Warrant for Nauta car and phones (22-mj-8548)	Redact	PII; potential witness safety; names and identifying information for witnesses and ancillary persons.
3	Unexecuted SDFL Search Warrant for Nauta residence and phones (22-mj-8549)	Redact	PII; potential witness safety; names and identifying information for witnesses and ancillary persons.
4	SDFL Search Warrant for Nauta Microsoft 45 Office Email (22-mj-8533)	Redact	PII; potential witness safety; names and identifying information for witnesses and ancillary persons.
5	SDFL Search Warrant for Nauta personal Apple iCloud (22-mj-8489)	Redact	PII; potential witness safety; names and identifying information for witnesses and ancillary persons.
6	SDFL Search Warrant for Nauta work Apple iCloud account (22-mj-8550)	Redact	PII; potential witness safety; names and identifying information for witnesses and ancillary persons.
7	DC Search Warrant for Nauta Google location data (SW-32)	Redact	PII; potential witness safety; names and identifying information for witnesses and ancillary persons.
8	DC Search Warrant for Nauta Verizon cell site data (SW-34)	Redact	PII; potential witness safety; names and identifying information for witnesses and ancillary persons.

9	Excerpt of Nauta FBI Interview Transcript	Redact	Potential witness safety/witness name / witness identifying information; remainder of transcript is unrelated to proposition for which exhibit is cited.
10	Excerpt of Nauta Grand Jury Transcript	Redact	Potential witness safety/witness name / witness identifying information; remainder of transcript is unrelated to proposition for which exhibit is cited; Rule 6(e).

3 - Government's Opposition to Defendant Donald J. Trump's Motion for Dismissal Based on Alleged Misconduct and Due Process Violations

RESPONSE TO MOTION: Proposed redactions in red boxes on pp. 7, 9, 20, 23-24. Rationale: Potential witness safety / witness names; protects integrity of potential Government witness testimony; Rule 6(e); references matters under seal.

GOVERNMENT CITATIONS TO DEFENSE EXHIBITS OR EXHIBITS FROM OTHER FILINGS WHERE GOVERNMENT HAS PROPOSED TO REDACT OR SEAL: Def. Ex. 2 (Gov't Response. at 7) – Seal. *See* ECF No. 348-1, at 9. Def. Ex. 7 to Mot. to Compel (Gov't Response at 9) – Redact. *See* ECF No. 267, at 3 and at Attachment B (sealed).

GOVERNMENT EXHIBITS:

Gov't Ex. No.	Description	Redact / Seal / None	Justification
1	FBI 302 for Interview of a Potential Witness	Redact	Ancillary names; potential witness safety/witness names.
2	Excerpt of a Grand Jury Transcript	Seal	Rule 6(e); potential witness safety/witness names.

4 - Government's Opposition to Waltine Nauta's Motion to Dismiss the Indictment Based on Selective and Vindictive Prosecution

RESPONSE TO MOTION: Proposed redactions in red boxes on p. 8. Rationale: Potential witness safety / witness identifying information; protects integrity of potential Government witness testimony; Rule 6(e).

GOVERNMENT CITATIONS TO DEFENSE EXHIBITS OR EXHIBITS FROM OTHER FILINGS WHERE GOVERNMENT HAS PROPOSED REDACTIONS OR SEALING:

Def. Ex. 7 (Government Response at 4, 10) – Redact for PII only. *See* ECF No. 348-1, at 7. Def. Exs. 4-5 (Government Response at 9) – Redact for PII only. *See* ECF No. 348-1, at 7.

GOVERNMENT EXHIBITS:

Gov't Ex. No.	Description	Redact / Seal / None	Justification
1	SDFL Mar-a-Lago Search Warrant (22-mj-8332)	Redact	Potential witness safety; names and identifying information for witnesses and ancillary persons
2	Excerpt of FBI Interview Transcript of a Potential Witness	Seal	Potential witness safety/witness names / witness identifying information; Jencks Act material for potential Government witness; details of potential witness testimony; references other non-public potential Government witness names and testimony; Rule 6(e)
3	Excerpt of Grand Jury Transcript of a Potential Witness	Seal	Potential witness safety/witness names / witness identifying information; Jencks Act material for potential Government witness; details of potential witness testimony; references other non-public potential Government witness names and testimony; Rule 6(e)